



FEDERAL ELECTION COMMISSION RQ-3
WASHINGTON, D.C. 20463

January 9, 1997

Jim Pledger, Treasurer
The Democratic Party of Arkansas
Federal Account
1300 West Capitol
Little Rock, AR 72201

Identification Number: C00024372

Reference: Amended Year End (7/1/95-12/31/95) dated 8/22/96, Amended April
Quarterly (1/1/96-3/31/96) dated 8/9/96, July Quarterly (4/1/96-
6/30/96, October Quarterly (7/1/96-9/30/96) and 12 Day Pre-General
(10/1/96-10/16/96) Reports

Dear Mr. Pledger:

This letter is to inform you that as of January 8, 1997, the Commission has not received your response to our requests for additional information dated December 18, 1996. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Edward D. Ryan on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", is written over the typed name.

John D. Gibson
Assistant Staff Director
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Jim Pledger, Treasurer
The Democratic Party of Arkansas
Federal Account
1300 West Capitol
Little Rock, AR 72201

DEC 18 1996

Identification Number: C00024372

Reference: 12 Day Pre-General Report (10/1/96-10/16/96)

Dear Mr. Pledger:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or

THE DEMOCRATIC PARTY OF ARKANSAS
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PAGE 2

refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Schedule H3 of your report (pertinent portions attached) discloses transfers-in from DEMOCRATS 96' to pay for Administrative/Voter Drive expenses of your committee. Please note that 11 CFR §106.5(g)(1)(i) permits a committee to "pay the entire amount of an allocable expense from its federal account and shall transfer from its non-federal account to its federal account solely to cover the non-federal share of that allocable expense" (emphasis added). As DEMOCRATS 96' is not a non-federal account of your committee, such transfers are prohibited.

If the transfers in question were incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received prohibited transfers, you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to DEMOCRATS 96'.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited transfers, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-Schedule H4 of your report discloses a disbursement(s) to non-federal candidates/committees and organizations. Please be advised that contributions to federal and non-federal committees do not qualify as shared expenses to be allocated between your federal and non-federal accounts. Contributions to federal committees should be disclosed on a Schedule B supporting Line 23 of the Detailed Summary Page and contributions to non-federal committees on a separate Schedule B supporting Line 29. Any

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PAGE 3

reimbursement from your committee's non-federal account for any portion of this contribution(s) is not permissible. 11 CFR §102.5(a)(1)(i)

The Commission recommends that you immediately transfer the funds received by your federal account, as reimbursement for the non-federal portion, back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Please provide a Schedule C or D, as appropriate, to support the entry of \$76,000 that should have been reported on Line 10 of the Summary Page. Loans and debts must be continuously reported until they are either repaid or settled. 11 CFR §104.3(d)

-You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information and may also supply a copy of a solicitation: the committee must request the contributor information in initial solicitations; make follow-up requests (if necessary); report the information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle. Furthermore, if a committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to the previous reports on which the contributions were originally disclosed. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

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FEDERAL ACCOUNT
PAGE 4

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): convention, merchandise, contract labor, Futa, match, service, and supplies. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Please clarify all expenditures made for media research, fundraiser, voter registration, and campaign materials on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category, not by individual purpose such as "Utilities" or "Rent". Please amend your report by providing the correct Administrative/Voter Drive EVENT YEAR-TO-DATE totals.

-Your report discloses a voided check totaling \$2,000 on Schedule A supporting Line 15 of the Detailed Summary Page. If the check written by your committee was not cashed, you should itemize the voided check as a negative entry on Schedule B supporting the line where the disbursement was originally disclosed. Please amend your report to correct this discrepancy or provide clarification regarding this transaction.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Refunds of contributions made to non-federal candidates and other political committees should be properly disclosed on a separate Schedule A, supporting Line 15 or 17 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days

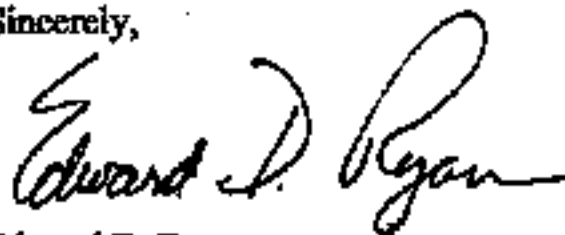
THE DEMOCRATIC PARTY OF ARKANSAS

FEDERAL ACCOUNT

PAGE 5

of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in black ink, reading "Edward D. Ryan". The signature is fluid and cursive, with the first name "Edward" and last name "Ryan" clearly legible.

Edward D. Ryan
Reports Analyst
Reports Analysis Division

SCHEDULE A
Contributions from Individuals/Persons

PAGE 4 OF 5
 FOR LINE NUMBER 11(a) (1)

NAME OF COMMITTEE (in Full)
 Democratic Party of Arkansas-Federal Account C00024372

Any information copied from such Reports and Statements may not be sold or used by any person for the purposes of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
John Miller P.O. Box 420 Malbourne, AR 72556- Receipt for [X]Primary	Businessman	10/07/96	\$100.00
	Aggregate YTD >		\$1100.00
Sheri Miller 4407 Cloudburst Memphis, TN 38141- Receipt for [X]Primary	Housewife	10/14/96	\$1000.00
	Aggregate YTD >		\$1000.00
Donald Munro P.O. Box 1257 Hot Springs National, AR 71901- Receipt for [X]Primary	Retiree	10/10/96	\$350.00
	Aggregate YTD >		\$350.00
Wanda Northcutt State Representative P.O. Box 358 Stuttgart, AR 72160- Receipt for [X]Primary	State Representative	10/14/96	\$500.00
	Aggregate YTD >		\$500.00
Chester Phillips 1501 N University Ave, ste 740 Little Rock, AR 72207- Receipt for [X]Primary	Real Estate	10/03/96	\$5000.00
	Aggregate YTD >		\$10000.00
Earl Rhein 2800 Dalewood Rd. Little Rock, AR 72207-2614 Receipt for [X]Primary	Retired	10/03/96	\$200.00
	Aggregate YTD >		\$200.00
Jimmy Shelby 77 Bama Circle Bryant, AR 72022- Receipt for [X]Primary	Assistant Director	10/11/96	\$300.00
	Aggregate YTD >		\$300.00
Edward Thicksten P.O. Box 2019 Alma, AR 72921- Receipt for [X]Primary	Businessman	10/14/96	\$300.00
	Aggregate YTD >		\$300.00
Carolyn Watkins 12400 Hunters Glen #21 Little Rock, AR 72211-2236 Receipt for [X]Primary	Retired	10/14/96	\$1000.00
	Aggregate YTD >		\$1000.00
SUBTOTAL of Receipts This Page			\$8750.00
TOTAL This Period			

SCHEDULE A
Contributions from Individuals/Persons

IDENTIFIED RECEIPTS

PAGE 5 OF 5
 FOR LINE NUMBER 11(a) (1)

NAME OF COMMITTEE (In Full)
 Democratic Party of Arkansas-Federal Account C00024372

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Willie Oates P.O. Box 24006 Little Rock, AR 72221- Receipt for [X] Primary	Retired	09/05/96	\$30.00
	Aggregate YTD >		\$289.00
Chester Phillips 1501 N University Ave, apt 740 Little Rock, AR 72207- Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	07/15/96	\$5000.00
	Aggregate YTD >		\$5000.00
Jim Pledger P.O. Box 928 Danville, AR 72033- Receipt for [X] Primary	Director, State Fair	08/15/96	\$50.00
	Aggregate YTD >		\$130.00
Jim Pledger P.O. Box 928 Danville, AR 72035- Receipt for [X] Primary	Director, State Fair	08/15/96	\$904.00
	Aggregate YTD >		\$434.00
Ann Pride 924 S. St. Asaph St. Alexandria, VA 22314- Receipt for [X] Primary	Teacher	09/05/96	\$210.00
	Aggregate YTD >		\$210.00
Lila Riggs 13500 Chenal Parkway Apt 700C Little Rock, AR 72211- Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	07/15/96	\$15.00
	Aggregate YTD >		\$521.00
Sue Smith 1014 Country Club Road Piggott, AR 72454- Receipt for [X] Primary	Teacher	08/15/96	\$450.00
	Aggregate YTD >		\$450.00
SUBTOTAL of Receipts This Page.....>			\$6059.00
TOTAL This Period.....>			\$17709.00

RECEIPT SCHEDULE H2

TRANSFERS FROM
NON-FEDERAL ACCOUNTS

PAGE 1 OF 3
FOR LINE 18

NAME OF COMMITTEE		TOTAL AMOUNT TRANSFERRED	
Democratic Party of Arkansas Federal Account			
NAME OF ACCOUNT		DATE OF RECEIPT	
Democratic Party AR		10/01/86	18926.10
EXPLANATION OF TRANSFER RECEIVED			
		ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT
		EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT	
1)	Total Administrative/Voter Drive.....	\$ 18926.10	
1)	Total Administrative/Voter Drive.....	\$ 18926.10	
11)	Direct Fundraising (List Events-Amounts)		
a)			
b)			
c)			
d)			
e)	Total Amount Transferred for Direct		
111)	Exempt Activity/Direct Candidate Support (List Events-Amount for each)		
a)			
b)			
c)			
d)			
e)	Total Amount Transferred for Exempt Activity/Direct Candidate Support.....		
NAME OF ACCOUNT		DATE OF RECEIPT	
DEMOCRATS 88		10/03/86	18265.30
EXPLANATION OF TRANSFER RECEIVED			
		ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT
		EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT	
1)	Total Administrative/Voter Drive.....	\$ 18265.30	
1)	Total Administrative/Voter Drive.....	\$ 18265.30	
11)	Direct Fundraising (List Events-Amounts)		
a)			
b)			
c)			
d)			
e)	Total Amount Transferred for Direct		
111)	Exempt Activity/Direct Candidate Support (List Events-Amount for each)		
a)			
b)			
c)			
d)			
e)	Total Amount Transferred for Exempt Activity/Direct Candidate Support.....		
TOTALS FOR EXPLANATION OF TRANSFER RECEIVED			
		ADMIN/VOTER DRIVE AMOUNT	EXEMPT ACTIVITY/DIRECT CAND. SUPPORT
GRAND TOTAL THIS PAGE.....		\$ 37191.40	37191.40

RECEIPT SCHEDULE B3

TRANSFERS FROM
NON-FEDERAL ACCOUNTSPAGE 21 OF 31
FOR LINE 18

NAME OF COMMITTEE		TOTAL AMOUNT TRANSFERRED									
Democratic Party of Arkansas Federal Account		1486.00									
NAME OF ACCOUNT		DATE OF RECEIPT									
DEMOCRATS 84		10/07/84									
<table border="1"> <thead> <tr> <th colspan="4">BREAKDOWN OF TRANSFER RECEIVED</th> </tr> <tr> <th>ADMIN/VOTER DRIVE AMOUNT</th> <th>DIRECT FUND-RAISING AMOUNT</th> <th>EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT</th> <th></th> </tr> </thead> </table>				BREAKDOWN OF TRANSFER RECEIVED				ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT	
BREAKDOWN OF TRANSFER RECEIVED											
ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT									
a) Total Administrative/Voter Drive.....		\$ 1486.00									
b) Total Administrative/Voter Drive.....		\$ 1486.00									
12) Direct Fundraising (List Events-Amounts)											
a)											
b)											
c)											
d)											
e) Total Amount Transferred For Direct ...											
11) Exempt Activity/Direct Candidate Support (List Events-Amount for each)											
a)											
b)											
c)											
d)											
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support.....											
NAME OF ACCOUNT		DATE OF RECEIPT									
Democratic Party AR		10/10/84									
TOTAL AMOUNT TRANSFERRED		27893.16									
<table border="1"> <thead> <tr> <th colspan="4">BREAKDOWN OF TRANSFER RECEIVED</th> </tr> <tr> <th>ADMIN/VOTER DRIVE AMOUNT</th> <th>DIRECT FUND-RAISING AMOUNT</th> <th>EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT</th> <th></th> </tr> </thead> </table>				BREAKDOWN OF TRANSFER RECEIVED				ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT	
BREAKDOWN OF TRANSFER RECEIVED											
ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT									
a) Total Administrative/Voter Drive.....		\$ 27893.16									
b) Total Administrative/Voter Drive.....		\$ 27893.16									
12) Direct Fundraising (List Events-Amounts)											
a)											
b)											
c)											
d)											
e) Total Amount Transferred For Direct ...											
11) Exempt Activity/Direct Candidate Support (List Events-Amount for each)											
a)											
b)											
c)											
d)											
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support.....											
<table border="1"> <thead> <tr> <th colspan="4">TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED</th> </tr> <tr> <th>ADMIN/VOTER DRIVE AMOUNT</th> <th>DIRECT FUND-RAISING AMOUNT</th> <th>EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT</th> <th></th> </tr> </thead> </table>				TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED				ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT	
TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED											
ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT									
SUBTOTAL THIS PAGE.....		\$ 29379.16									
		29379.16									

RECEIPT SCHEDULE B3

TRANSFERS FROM
NON-FEDERAL ACCOUNTS

PAGE 3 OF 3

FOR LINE 10

NAME OF CONTRIBUTOR		DATE OF RECEIPT		TOTAL AMOUNT TRANSFERRED
Democratic Party of Arkansas Federal Account		10/11/98		4572.82
NAME OF ACCOUNT				
DEMOCRATS DC				
BREAKDOWN OF TRANSFER RECEIVED				
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT	
1) Total Administrative/Voter Drive.....	4	4572.82		
2) Total Administrative/Voter Drive.....	2	4572.82		
11) Direct Fundraising(List Events-Amounts)				
a)				
b)				
c)				
d)				
e) Total Amount Transferred for Direct				
111) Exempt Activity/Direct Candidate Support (List Events-Amount for each)				
a)				
b)				
c)				
d)				
e) Total Amount Transferred for Exempt Activity/Direct Candidate Support.....				
NAME OF ACCOUNT		DATE OF RECEIPT		TOTAL AMOUNT TRANSFERRED
Democratic Party AR		10/18/98		178000.00
BREAKDOWN OF TRANSFER RECEIVED				
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT	
1) Total Administrative/Voter Drive.....	4	178000.00		
2) Total Administrative/Voter Drive.....	2	178000.00		
11) Direct Fundraising(List Events-Amounts)				
a)				
b)				
c)				
d)				
e) Total Amount Transferred for Direct				
111) Exempt Activity/Direct Candidate Support (List Events-Amount for each)				
a)				
b)				
c)				
d)				
e) Total Amount Transferred for Exempt Activity/Direct Candidate Support.....				
TOTAL FOR BREAKDOWN OF TRANSFER RECEIVED				
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT	
SUBTOTAL THIS PAGE.....	4	180572.82		180572.82
TOTAL THIS PERIOD.....	4	241015.17		241015.17

